

**State of Alaska - Air Operating Permit Program
Owner Requested Limit
Draft – March 9, 2010**

STATIONARY SOURCE IDENTIFICATION:

AQ0063ORL01

Owner:	Union Oil Company of California (UOCC)
Operator:	UOCC
Stationary Source:	Baker Platform
Stationary Source Address:	Upper Cook Inlet
City, State, Zip:	Alaska
Location:	60° 49' 45" North, 151° 21' 02: West
Stationary Source Contact:	Johnny Santiago
Phone Number:	(907) 776-6640

The above-named owner/operator has submitted a complete request for an owner requested limit (ORL) under 18 AAC 50.225(b) for the Baker Platform. The Department of Environmental Conservation (Department) approves the ORL to restrict the stationary source potential to emit. The ORL allows UOCC to avoid the requirements for a Title V operating permit under 18 AAC 50.326 and a minor permit under 18 AAC 50.502(c)(3). The Department certifies that the ORL is effective as of the date noted below.

In accordance with 18 AAC 50.225(f), the owner/operator has agreed to the conditions listed on the following pages.

The owner/operator may revise the terms or conditions of this approval under 18 AAC 50.225 (h)(1) by submitting a request under 18 AAC 50.225(b). The owner/operator may request the Department revoke the limit in accordance with 18 AAC 50.225(h)(2). This limit remains in effect until the Department approves a new limit or revokes it.

I understand and agree to the terms and conditions of this approval.

Union Oil Company of California_____
Owner or Operator

DALE HAINES_____
Printed Name

Signature

Title: Alaska Operations Manager

Department approval:

DRAFT

John F. Kuterbach, Program Manager
Air Permit Program

DRAFT

Owner Requested Limit Effective Date

CONDITIONS:

1. **Owner Requested Limits to Avoid a Title V Operating Permit and a Title I Minor Permit.**

The Owner/Operator shall limit the hours of operation of Fire Water Pump Engine (Emission Unit 1) to 500 hours per any consecutive 12-month period and limit the amount of gas flared in Emission Unit 2 to 50.4 MMscf per any consecutive 12 month period

1.1 Monitor the consecutive 12-month hours of operation of Emission Unit 1 and amount of gas flared in Emission Unit 2 as follows:

- a. Track the number of hours Emission Unit 1 is used monthly and for any consecutive 12-month period. Owner/Operator shall not use Emissions Unit 1 for more than 500 hours per any consecutive 12-month period. Monitor the hours of operation with an hour meter installed on Emission Unit 1. The accuracy of the hour meter shall not exceed five percent.
- b. Track the cubic feet of gas flared in Emission Unit 2 monthly and for any consecutive 12-month period. The amount of gas flared in Emission Unit 2 shall not exceed 50.4 MMscf per any consecutive 12-month period. Monitor the gas flow to the flare with a dedicated gas flow meter installed on the flare. The accuracy of the flow meter shall not exceed five percent.

1.2 Calculate, record, and report the number of hours Emission Unit 1 operates as follows:

- a. At the end of each month, calculate and record the number of hours of operation for the month, then calculate the 12-month rolling total number of hours by adding to the previous 11 months.
- b. Retain the records of the rolling 12-month total number of hours for the period stipulated in Condition 2.
- c. Report as indicated in Conditions 3 and 4

1.3 Calculate, record, and report the amount of gas flared in Emission Unit 2 follows:

- a. At the end of each month, calculate and record the cubic feet of gas flared for the month, then calculate the 12-month rolling total cubic feet of gas flared by adding to the previous 11 months.
- b. Retain the records of the rolling 12-month total cubic feet of gas flared for the period stipulated in Condition 2.
- c. Report as indicated in Condition 3 and 4.

2. **Recordkeeping Requirements.** Unless otherwise specified in this authorization, keep all records required by this ORL for at least five years from the date of collection.

3. **Annual Operating Reports.** Submit the original, along with one copy, of an annual operating report for the stationary source to the Department, Air Permits Program, 610 University Avenue, Fairbanks, Alaska 99709-3643 by February 1 for the preceding calendar year. Certify the report as specified in 18 AAC 50.205 by having the responsible official sign after the following statement, "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete." Attach copies of all excess emission and deviation forms submitted to Department during the reporting period pursuant to Condition 4.

4. **Excess Emissions and Deviation Reports.** Report all emissions or operations that exceed or deviate from the requirements of this ORL limit as follows:

- 4.1 In accordance with 18 AAC 50.240(c), as soon as possible after the event commences or is discovered, report emissions that present a potential threat to human health or safety and excess emissions believed to be unavoidable.
- 4.2 Report all other excess emissions and deviations:
 - a. within 30 days of the end of the month in which the emissions or deviation occurs, except as provided in Condition 4.2b; and
 - b. if a continuous or recurring excess emission is not corrected within 48 hours of discovery, report within 72 hours of discovery unless the Department provides written permission to report under Condition 4.2a.
- 4.3 When reporting excess emissions and deviations use either the Department's on-line form, which is in Attachment A and at <http://www.dec.state.ak.us/air/ap/docs/eeform.pdf>, or provide all information called for by that form.
- 4.4 If requested by the Department, provide a more detailed written report as requested to follow up an excess emissions report.

Statement of Avoided Requirement:

The potential to emit for emission units listed in **Table** will be below 100 tpy for NO_x. This ORL limits stationary source-wide NO_x emissions to no more than 99.9 tpy.

Consistent with the definition of "potential to emit" listed in AS 46.14.990(23), the capacity of the stationary source to emit an air pollutant is verifiable through the monitoring, record keeping, and reporting contained in this approval. By limiting the potential to emit of emission units listed in **Table** the owner/operator is avoiding the requirement to obtain a Title V operating permit for the stationary source under 18 AAC 50.326 and AS 46.14.130(b) and the requirement to obtain a minor permit under 18 AAC 50.502(c)(3) and AS 46.14.130(c).

Table 1 - Emission Unit Inventory Subject to Limits

ID	Unit Name	Unit Description	Nominal Rating/Size	Install Date
1	Fire Water Pump Engine	Diesel-fired	125 hp	2010
2	Flare	Gas Flare	50.4 MMscf/yr	2010

Attachment A. ADEC Notification Form

Baker Platform AQ0063ORL01
Stationary Source Name Air Quality ORL Number
Union Oil Company of California
Company Name

When did you discover the Excess Emissions/Deviation?

Date: / / Time: :

When did the event/deviation?

Begin: Date: / / Time: : (please use 24hr clock)

End: Date: / / Time: : (please use 24hr clock)

What was the duration of the event/deviation: : (hrs:min) or days
(total # of hrs, min, or days, if intermittent then include only the duration of the actual emissions/deviation)

Reason for notification: (please check only 1 box and go to the corresponding section)

- ☐ Excess Emissions - Complete Section 1 and Certify
☐ Deviation from ORL Conditions - Complete Section 2 and Certify
☐ Deviation from COBC, CO, or Settlement Agreement - Complete Section 2 and Certify

Section 1: Excess Emissions

(a) Was the exceedance ☐ Intermittent or ☐ Continuous

(b) Cause of Event (Check one that applies):

- ☐ Start Up/Shut Down ☐ Natural Cause (weather/earthquake/flood)
☐ Control Equipment Failure ☐ Scheduled Maintenance/Equipment Adjustments
☐ Bad fuel/coal/gas ☐ Upset Condition ☐ Other

(c) Description

Describe briefly what happened and the cause. Include the parameters/operating conditions exceeded, limits, monitoring data and exceedance.

(d) Emission Units Involved:

Identify the emission unit involved in the event, using the same identification number and name as in the ORL. Identify each emission standard potentially exceeded during the event and the exceedance.

Unit ID	Unit Name	ORL Condition Exceeded/Limit/Potential Exceedance

(e) Type of Incident (please check only one):

- ☐ Opacity % ☐ Venting (gas/scf) ☐ Control Equipment Down
☐ Fugitive Emissions ☐ Emission Limit Exceeded ☐ Record Keeping Failure
☐ Marine Vessel Opacity ☐ Failure to monitor/report ☐ Flaring
☐ Other:

(f) Unavoidable Emissions:

Do you intend to assert that these excess emissions were unavoidable? ☐ YES ☐ NO

Do you intend to assert the affirmative defense of 18 AAC 50.235?

☐ YES

☐ NO

Certify Report ([go to end of form](#))

Section 2. Deviations

(a) Deviation Type (check one only box, corresponding with the section in the ORL)

☐ Emission Unit Specific

☐ General Source Test/Monitoring Requirements

☐ Recordkeeping/Reporting/Compliance Certification

☐ Standard Conditions Not Included in ORL

☐ Generally Applicable Requirements

☐ Reporting/Monitoring for Diesel Engines

☐ Insignificant Emission Unit

☐ Stationary Source Wide

☐ Other Section: _____ (title of section and section number of your ORL)

(b) Emission Unit Involved:

Identify the emission unit involved in the event, using the same identification number and name as in the ORL. List the corresponding ORL condition and the deviation.

Unit ID	Unit Name	ORL Condition /Potential Deviation

(c) Description of Potential Deviation:

Describe briefly what happened and the cause. Include the parameters/operating conditions and the potential deviation.

(d) Corrective Actions:

Describe actions taken to correct the deviation or potential deviation and to prevent future recurrence.

Certification:

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Printed Name: _____ Title: _____ Date: _____

Signature: _____ Phone Number: _____

To Submit this Report:

Fax to: 907-451-2187

Email to: airreports@dec.state.ak.us - *if emailed, the report must be certified within the operating report required for the same reporting period;*

Mail to: ADEC, Air Permits Program, 610 University Avenue, Fairbanks, AK 99709-3643

Phone Notification: 907-451-5173 - *phone notifications require a written follow-up report within the deadline listed in Condition 4; OR*

Online Submission: *(Website is not yet available) - if submitted online, the report must be certified within the operating report required for the same reporting period.*